

1089

**SIERRA
CLUB****REDWOOD CHAPTER**

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September 22, 1999

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The Redwood Chapter of the Sierra Club submits the following comments on the June 1999 Draft Programmatic EIS/EIR for the CALFED Bay-Delta program. The Redwood Chapter has a membership of about 8,000 and extends geographically from Sonoma County's southern border to the Oregon border and east into Solano and Napa Counties. The Trinity River which is dammed and diverted into the Central Valley Project lies within our region. The Napa and Petaluma Rivers feed into the Delta. Southern Solano County extends to San Francisco Bay. The entire northern California Coastline, identified as part to the CALFED Solution Area lies within our Chapter boundaries as well.

Our members are concerned with restoration of California's ecosystem. Here in the North Coast region we are intimately aware of the devastating environmental impacts that arise from dams, water diversions and watershed mismanagement - mainly from logging. We are appreciative of the fact that CALFED was formed in order to address the horrific environmental degradation that has taken place in the Bay-Delta and its watersheds, most prominently evidenced by plummeting fish populations.

Although there is now much talk about balancing the needs of agriculture, urban users and the environment, we urge you to remember that the need for ecosystem restoration was the reason CALFED was called into existence. We recognize the enormity of the task, given the degree of environmental harm that has transpired, but CALFED should do more than aim to achieve 'stable, self-sustaining' populations of species. Instead, restoring fish and wildlife populations to levels that existed prior to the operation of the federal and state water projects should be the goal.

To explore, enjoy and protect the earth

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There also needs to be a guarantee that there will be adequate freshwater flows in all Bay-Delta waterways and into the Bay itself. The June 1999 draft does not quantify how much water will be needed to restore the waterways. It does not specify the additional amounts of water needed to restore the ecology of Bay-Delta estuary and San Francisco Bay. The plan fails to provide a plan of action for ensuring the needed additional flows and also fails to make an absolute commitment to providing these flows. Guarantees of more fresh water flows through the Delta are essential to improving water quality for people and wildlife.

We recognize the need for a reliable water supply for all users, but it is well understood that dams and surface water storage have contributed enormously to current environmental degradation. There are already over 1400 dams on California Rivers. 90% of the historic salmon spawning streams are now behind dams with only 300 miles of undammed salmon spawning grounds left accessible in the Bay-Delta river system. Dams are very much a part of the current problem. More dams are not the solution.

What is needed is water conservation by all users. Sacramento and other Central Valley urban areas do not meter water use. It's been estimated that water meters in Sacramento alone could save the amount of water that could be stored behind a 550 foot high dam. Water conservation works. In Southern California urban water consumption has held steady since the early 1980's due to technically augmented water conservation practices, despite large population increases.

Local environmental engineers, Ned Orrett and John Rosenblum testified at the CALFED hearing here in Santa Rosa that industrial water savings in the range of 60-98% can be realized. These water savings also translate into cost savings for business, so water conservation can and is good for the economy as well.

Most of the water in the Bay-Delta system is going to agriculture (80%). Although agricultural users have implemented water conservation programs, much more can be done. It makes more economic sense during drought years to pay farmers to not grow water intensive crops like alfalfa and cotton than to build dams and pay the high price of ecosystem destruction.

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We urge that the Trinity River diversion into the Central Valley Project be reduced. Currently an almost unbelievable 75% of the Trinity's flows are exported to the Sacramento River. The damage to the Trinity's fish populations - and entire riparian ecosystem- is legendary. The diversion should be reduced to at most 50% and CALFED must recognize that Bay-Delta ecosystem health cannot be supported by continuing harm to the Trinity.

All of California's Wild and Scenic Rivers, including the Eel River should be explicitly recognized as 'off limits' as sources for future Bay-Delta water supplies.

The bottom line is that aggressive water conservation programs need to be put in place before any consideration is given to new dams. No dams should be considered at all during the first seven year stage of the program. This should include no 'off-stream' dams and no expansion of current dams and reservoirs. These variations on the same dam theme also block and/or inundate additional natural habitat causing the same environmental damage as their mainstream relatives.

Additionally water conservation and other efficiency measures are more cost effective than engineered storage schemes. The full cost of any such facilities should be paid for by the actual users - not distributed across the entire state tax base. Taking this into consideration, it is doubtful that dams and new surface storage could be considered economically viable by agricultural users or urban users. Conservation works - it's best for the economy and best for the environment.

We have concerns about the concept of an "Environmental Water Account" as an approach to improving efficient allocation of the limited water resource. Although, allowing agricultural users to sell water at market rates may on the surface make economic efficiency sense, this could lead to more displacement of farms by urban sprawl. Careful consideration of the full circle impacts of such an approach, as well as State and Federal Legislative impacts, must be evaluated.

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It is imperative that Californians begin to recognize the necessity of living within the constraints of the natural systems upon which we depend. We now know that the large-scale projects of the past that attempted to reengineer natural systems brought benefits that were accompanied by incredible environmental costs. We can learn from these past mistakes and not repeat them. Instead, water strategies that cost the least and promise to deliver the most: water conservation, water recycling, better ground water management, and other urban and agricultural efficiency measures should be implemented. We support CALFED's proposals in those directions.

Thank you for the opportunity to comment on the June 1999 draft, and thank you for considering our views.

Sincerely yours,

Marianne De Sobrino, Chair
Redwood Chapter Sierra Club